



Illinois State Board of Education

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Gery J. Chico
Chairman

Christopher A. Koch, Ed.D.
State Superintendent of Education

November 8, 2013

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: FCC's Notice of Proposed Rulemaking to Modernize the E-rate Program for Schools and Libraries, WC Docket No. 13-184

Dear Ms. Dortch:

The Illinois State Board of Education (ISBE) has oversight of the state's more than 860 public school districts located in over 4,200 buildings. Illinois public schools serve more than 2,000,000 students. Since the inception of the E-rate program, Illinois' public schools have relied on these funds to help support their connectivity needs, annually bringing in anywhere from 3% - 5% of national total E-rate funds.

Illinois' schools rely on E-rate discounts to support the technological and connectivity needs of their educational communities. E-rate funding has allowed schools to begin building technology infrastructure; however, technology infrastructure and connectivity are still inadequate in many of our schools, especially in rural parts of the state. Modern infrastructure and connectivity are needed to provide 21st Century teaching and learning for students. As broadband access becomes more readily available, E-rate funding now, more than ever, is imperative for schools to take advantage of opportunities for individualized education, teacher professional development, blended learning opportunities and all aspects of digital aged learning.

Within the last year over 80% of Illinois' educational entities completed the technology infrastructure surveys found within the Online Technology Readiness Tool (TRT). While the TRT responses are self-reported, in May 2013 over 60% of Illinois schools participated in Education SuperHighway's National Speed Test. Both tools confirmed that only 25% of Illinois' schools have the capacity to complete online digital learning when using the State Educational Technology Directors Association's recommendation of at least 100 Mb/s per 1,000 students/staff. Based upon the TRT, 51% of Illinois schools have a connection of 20Mb/s, or less. 15% of the schools have access to connection speeds of up to 50 Mb/s, while 26% have access to 100Mb/s connection speeds. Approximately 1% has a connectivity level higher than indicated above, while 7% did not respond to the survey question. Using these figures, it has been determined it will cost between \$150M - \$350M to achieve President Obama's ConnectED initiative's goal of 1Gb/s broadband connections to 99% of schools within 5 years.

The Illinois State Board of Education supports the comments made by State Education Technology Directors' Association (SETDA), State E-rate Coordinators Alliance (SECA), and Illinois Central Management System (IL CMS). The following principles align with the focus and direction that the state of Illinois is moving in to support the needs of our districts:

- Robust broadband to 100% of schools meeting state and local capacity to achieve school broadband goals should be supported by E-rate.
- Remove legacy services and make essential broadband equipment Priority 1.
- Funding should be provided at district level - not per student or building level.
- A primary goal for a modernized E-rate should be to drive down the average recurring total monthly cost per Mb of school internet connection capacity over time.
- Consider, but not require, the cost efficiency of consortium purchasing and multi-year contracts.
- Release of one time capital funds to build out statewide broadband fiber networks (via state E-rate application), school districts should only have to harness the burden of recurring charges and essential broadband equipment to take advantage of this enhanced network.
- E-rate application process must be simplified -
 - Simple average discount method.
 - Portal should be used to apply and maintain information.
 - Billed Entity Applicant Reimbursement (BEAR) payments should go directly to schools.
 - Pricing should be transparent and available to the public.

The Illinois State Board of Education also believes funding for the E-rate program should be increased to fully support the ideals set forth in this document and further progress in the original purpose of the program. Thank you for the opportunity to respond, and for recognizing how important this program is for the students of Illinois and across the nation.

Sincerely,

A handwritten signature in black ink that reads "Christopher A. Koch". The signature is written in a cursive, slightly stylized font.

Christopher A. Koch, Ed.D.
State Superintendent of Education